



MICHAEL C. DELL'ANGELO / EXECUTIVE SHAREHOLDER
d 215.875.3080 m 610.608.8766 | mdellangelo@bm.net

September 27, 2023

VIA ECF

Brian M. Cogan, United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Gao v. Singularity Future Technology Ltd. et al.*,
Case No. 1:22-cv-7499-BMC**

Dear Judge Cogan:

We represent Lead Plaintiffs Ruibin Wang, Sen Gao, Luxiao Xu, and Congli Huo in the above-referenced case.

Pursuant to Your Honor's Order granting various Defendants' Motions for a Pre-Motion Conference (ECF Nos. 46, 47, 48, and 50), in response to the alleged deficiencies raised in Defendants' Pre-Motion letters, Plaintiffs intend to file a Second Consolidated Amended Complaint prior to the Pre-Motion Conference scheduled for October 6, 2023. Plaintiffs have conferred with Defendants and, with the Court's permission, propose to file their Second Amended Complaint on October 6, 2023, with Defendants' answers or renewed Pre-Motion letters due on October 20, 2023.

Respectfully submitted,

Michael C. Dell'Angelo

cc: All Counsel of record (via ECF)

Filing the SCAC by 10/6/23 is fine, but if defendants still want to move against it, the premotion conference is waived and they may file their motions to dismiss.

SO ORDERED: 9/27/23

Brian M. Cogan

USDJ

1818 MARKET STREET, SUITE 3600
PHILADELPHIA, PA 19103
215.875.3000 | **BERGERMONTAGUE.COM**